

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

TRUSTEES OF CHICAGO PAINTERS AND DECORATORS PENSION FUND, et al)
)
)
Plaintiffs,) No. 25-cv-03642
)
) Chief Judge Kendall
v.)
) Magistrate Judge McLaughlin
RIGHT PAINTING INC., an Illinois corporation.)
)
Defendant.)

**PLAINTIFFS' MOTION FOR
JUDGMENT IN A SUM CERTAIN**

Plaintiffs, by and through their attorneys, PAUL M. EGAN, JAMES R. ANDERSON, GRANT R. PIECHOCINSKI, and ARNOLD AND KADJAN, LLP, pursuant to Fed R. Civ. P 55, move this Court to enter a final default judgment in a sum certain. In support of their Motion, the Plaintiffs state as follows:

1. This is an action for the recovery of delinquent contributions and other charges due and owing as a result of the breach of collective bargaining agreements, Declarations of Trust, and applicable provisions of ERISA.
2. The Defendant was defaulted by order of this Court on June 25, 2025 for failing to appear and plead within the time allotted by the Federal Rules of Civil Procedure.
3. According to the Affidavit of Richard Wolf, attached hereto as Exhibit 1, based upon the findings of an audit for the period from September 1, 2023 through May 31, 2025, the Defendant owes \$225,317.06 to Plaintiffs as fully set forth in paragraph 5 of his Affidavit, consisting of \$148,629.71 in contributions, \$10,239.22 in discrepancies, \$22,294.46 in liquidated damages on the audit findings; \$42,578.57 for prior unpaid liquidated damages, and \$1,575.00

for audit costs.

4. According to the Declaration of James R. Anderson, attached hereto as Exhibit 2, the Plaintiffs have incurred reasonable attorneys' fees and costs in the amount of \$2,694.64, consisting of \$2,100.00 in attorneys' fees and \$594.64 in costs. Attorneys' fees and costs are recoverable pursuant to the terms of the collective bargaining agreement, declarations of trust, and applicable provisions of the ERISA, 29 U.S.C. Section 1132 (g)(2)(D).

5. The sum of the amounts owed in paragraphs 4 and 5 is \$228,111.70.

WHEREFORE, Plaintiffs pray that this Court grant the following relief:

A. Enter final judgment in favor of Plaintiffs and against the Defendant, Right Painting in the amount of \$228,011.70.

Respectfully submitted,

s/s James R. Anderson
By: One of Plaintiffs' attorneys

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(312) 236-0415

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Plaintiffs,)	Case No. 25-cv-03642
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RIGHT PAINTING INC., an Illinois corporation.)	
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)	Magistrate Judge
Defendant.)	McLaughli

CERTIFICATE OF SERVICE

TO: Blondean Gartley President and Registered Agent
Right Painting, Inc.
305 South Kostner
Chicago Illinois 60624

That the undersigned, an attorney of record, hereby certifies that the Plaintiffs' Motion for Judgment in a Sum Certain was mailed to the Defendant listed above on August 20, 2025:

TRUSTEES OF THE CHICAGO PAINTERS AND
DECORATORS PENSION FUND et al,

By: /s/James R. Anderson

Paul M. Egan
James R. Anderson
Grant R. Piechocinski
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